

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-WMW-JFD

**DECLARATION OF MICHAEL E. BLOOM IN SUPPORT OF SMARTMATIC'S
SECOND MOTION TO COMPEL**

I, Michael E. Bloom, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of 18, I am competent to make this declaration, and I have personal knowledge of the facts stated herein. These facts are true to the best of my knowledge, information, and belief, and if called upon to testify as a witness, I could and would testify competently to them.

2. I am a partner at the law firm Benesch, Friedlander, Coplan & Aronoff, LLP, and I represent Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited (“Smartmatic”) in the above-captioned lawsuit.

3. Attached as Exhibit A is a true and correct copy of Smartmatic’s Third Set of Requests for Production.

4. Attached as Exhibit B is a true and correct copy of Defendants' Responses to Plaintiffs' Third Set of Requests for Production.

5. Attached as Exhibit C is a true and correct copy of a May 16, 2023 letter from James Bedell to Abraham Kaplan.

6. Attached as Exhibit D is a true and correct copy of a June 5, 2023 email from James Bedell to Abraham Kaplan.

7. Attached as Exhibit E is a true and correct copy of pages 1 and 2 of DEF082645, a document produced in this case by Defendants.

8. Attached as Exhibit F is a true and correct copy of page 143 of DEF084420, a document produced in this case by Defendants.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Michael E. Bloom

Executed on July 10, 2023.